



October 29, 2012

Michigan House of Representatives
Lansing, Michigan

Re: SB 314 – Yard Waste Ban Exemption

Dear Representatives:

The Michigan Environmental Council was established in 1980 and is a coalition of environmental, public health and faith-based groups from across Michigan. We have worked in a variety of areas including waste disposal and energy policy since our inception. We strongly urge your opposition to these bills.

We supported the ban because first and foremost – **yard waste is not trash**. When properly handled, yard waste is good for the environment. That has not changed. Grass clippings, when allowed to return to the lawn instead of being collected, lead to a healthier lawn that needs less watering. Secondly, all yard waste when combined and composted creates a soil enhancement that can benefit farms, gardens, and green spaces. The bills undermine educational efforts of the last twenty years on the value of mulching mowers, backyard composting and soil enrichment.

Of critical importance these days is the loss of jobs that will occur due to these bills. **These bills will lead to some composting companies going bankrupt, people losing their jobs, and significant losses by those who have financed expensive composting machinery.** The money that these companies spend on machinery, maintenance, trucking and running their businesses will disappear.

Landfills and landfill gas, on the other hand, are a source of toxic air pollutants, a potential risk to drinking water and can be a nuisance lowering the property value of nearby homes. **These bills will result in more landfills in our communities.** The legislation also will be an administrative nightmare, making enforcement of the yard waste ban impossible, especially in those communities that send waste to a variety of facilities.

There has also been some misinformation on the amount of energy that will be generated. Michigan currently only has about 125 megawatts (MW) of landfill capacity. Proponents argue that if all major landfills in the state put in gas collection systems we would have approximately 270 MW of capacity. Their own documents show that adding yard waste

to landfills will only increase the production by about 10%. Therefore, adding yard waste only has the potential to increase landfill gas energy production by between 12-27 MW. This amount is not worth the loss of economic development in Michigan.

The most recent report on implementation of PA 295 noted landfill gas contracts ran from \$99/MW to \$137/MW, significantly higher than other renewable resources.

Lastly, including yard waste in landfills would have a net impact of increasing greenhouse gases into our atmosphere. This is because the breakdown of these materials in the low-oxygen landfill setting creates methane instead of carbon dioxide. Methane is a much more powerful greenhouse gas than carbon dioxide (23 times more). This fact, coupled with the relatively low gas collection rate of landfills, leads to a net increase in greenhouse gases even assuming the overly optimistic capture rate included in the bills. The overall projected increase in renewable energy annually is made meaningless by the increase in greenhouse gases.

More greenhouse gases, more landfills and more layoff notices make these bills bad policy for the State of Michigan. Instead Michigan should be exploring policies that would make us a clean energy leader around the country. We urge members to oppose SB 314.

Sincerely,

A handwritten signature in dark ink, appearing to be 'JC' or similar initials, written in a cursive style.

James Clift, Policy Director